

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

EDNA FRANCHINI and VALERIE SEALS,
*individually and on behalf of all others similarly
situated,*

Plaintiffs,

v.

ACCU-TIME SYSTEMS, INC.,

Defendant.

Case No. 1:21-cv-05075

Hon. Steven C. Seeger

Magistrate Judge Sheila M. Finnegan

AGREED MOTION FOR ENTRY OF CONFIDENTIALITY ORDER

Defendant Accu-Time Systems, Inc. (“ATS”) hereby moves this Court to enter an Agreed Confidentiality Order. In support of its Motion, ATS states as follows:

1. Federal Rule 26(c) authorizes the Court to enter a protective order regarding discovery for good cause shown. Fed. R. Civ. P. 26(c).

2. The parties anticipate that confidential materials will be disclosed during the course of this litigation. Such materials may include, but are not limited to, confidential information related to ATS’s business and records containing personal identifying information. Accordingly, good cause exists for the issuance of a protective order because the confidential materials described above merit protection from public disclosure.

3. The parties have conferred and agreed upon the entry of a proposed Agreed Confidentiality Order, based upon the Model Confidentiality Order contained in the Local Rules for the Northern District of Illinois, which separately will be submitted for consideration by the Court.

WHEREFORE, ATS respectfully requests that this Court enter the parties’ Agreed Confidentiality Order as proposed.

Dated: January 6, 2022

Respectfully submitted,

ACCU-TIME SYSTEMS, INC.

By: /s/ Sonya Rosenberg
One of Its Attorneys

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*Counsel for Defendant Accu-Time
Systems, Inc.*

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that I have this 6th day of January, 2022, electronically filed the foregoing with the Clerk of Court using the CM/ECF system, which will automatically send an e-mail notification of such filing to all counsel of record.

/s/ Alexis M. Dominguez

Counsel for Defendant

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